

RANDY P. CATALANO, ESQUIRE (#5756)
Sentry Office Plaza, Suite 100
216 Haddon Avenue
Westmont, NJ 08108
(856) 858-1115
Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ELIZABETH JONES,	:	
	:	
Plaintiff,	:	
vs.	:	CIVIL ACTION
	:	
TRUSTEES OF THE	:	
UNIVERSITY OF PENNSYLVANIA,	:	NO.
COMMUNITY RENOVATIONS, INC. and	:	
JOHN WILLIAMS,	:	
	:	
Defendants.	:	

COMPLAINT - JURY TRIAL DEMAND

1. Plaintiff, Elizabeth Jones, is an adult individual residing at 212 Colin Lane, Collings Lakes, New Jersey 08094.
2. Defendant, Trustees of the University of Pennsylvania is entity doing business in the State of Pennsylvania, with its business office located at 421 Franklin Building, 3451 Walnut Street, Philadelphia, Pennsylvania 19104-6205.
3. Defendant, Community Renovations, Inc. is a corporation of the State of Pennsylvania, with its principal office located at 874 Douglas Avenue, Elkins Park, Pennsylvania 19027.
4. Defendant, John Williams, is an individual employed by Community Renovations, Inc. whose address is 874 Douglas Avenue, Elkins Park, Pennsylvania

19027.

4. Jurisdiction in this matter is based upon diversity of citizenship pursuant to 28 U.S.C. §1332 and the amount in controversy, exclusive of interest and costs, exceeds the sum of \$75,000.00 as to each individual plaintiff.

5. Venue in this action is properly laid in this judicial district pursuant to 28 U.S.C. §1391.

FIRST COUNT

ELIZABETH JONES vs. DEFENDANT, TRUSTEES OF THE UNIVERISTY OF PENNSYLVANIA

6. Plaintiff hereby incorporates by reference the paragraphs stated above as though fully set forth at length herein.

7. At all times relevant hereto the defendants, Trustees of the University of Pennsylvania, leased a passenger van from defendant, Community Renovations, Inc. which was operated by Community Renovations, Inc. for the purpose of providing transportation/shuttle service for visitors, employees and business invitees from the parking lots and parking garage of the Hospital of the University of Pennsylvania to the entrance to said hospital located at 3400 Spruce Street, Philadelphia, Pennsylvania.

8. On or about September 10, 2004, plaintiff, Elizabeth Jones, boarded the defendants' shuttle van at the parking garage of the Hospital of the University of Pennsylvania.

9. On the date and place aforesaid, the operator of the van, defendant, John Williams, requested plaintiff to close the door of the van at which time plaintiff was caused to fall out of the van resulting in serious injuries to the plaintiff, Elizabeth Jones,

which are described hereinafter.

10. The aforesaid accident was caused by the negligence of defendants, Trustees of the University of Pennsylvania and/or its agents, servants and/or employees as follows:

- (a) failing to properly manage or oversee the shuttle van service;
- (b) failing to hire adequate staff for the shuttle van service;
- (c) failing to properly train van drivers;
- (d) failing to protect the safety of passengers on the van;
- (e) failing to have due regard for the plaintiff;
- (f) failing to follow proper protocol, procedures and rules applicable

for the operation of the shuttle van service;

(g) and was otherwise careless and negligent in the operation of the shuttle van service.

11. As a result of the aforesaid negligence of the defendants, Trustees of the University of Pennsylvania, plaintiff, Elizabeth Jones, sustained serious, permanent and disabling injuries, endured pain and suffering, incurred medical expenses, was unable to attend to her normal duties and affairs, lost wages, and was otherwise injured and damaged.

WHEREFORE, plaintiff, Elizabeth Jones, demands judgment in her favor and against defendants, Trustees of the University of Pennsylvania, in an amount in excess of \$75,000.00, together with interest, costs of suit and such other relief as the court may deem appropriate.

SECOND COUNT

**ELIZABETH JONES vs. DEFENDANT, COMMUNITY RENOVATIONS, INC. and
JOHN WILLIAMS**

12. For the purpose of brevity, all paragraphs of the First Count are included herein by reference and made a part hereof as if set forth at length.

13. On or about September 10, 2004, plaintiff, Elizabeth Jones, boarded the shuttle van owned and operated by defendant, Community Renovations, Inc. at the parking garage of the Hospital of the University of Pennsylvania.

14. On the date and place aforesaid, the operator of the van, defendant, John Williams, requested plaintiff to close the door of the van at which time plaintiff was caused to fall out of the van resulting in serious injuries to the plaintiff, Elizabeth Jones, which are described hereinafter.

15. The aforesaid accident was caused by the negligence of defendants, Community Renovations, Inc. and/or its agent, servant and/or employee, John Williams, as follows :

- (a) failing to hire adequate staff for the van;
- (b) failing to properly train van drivers;
- (c) failing to protect the safety of passengers on the van;
- (d) failing to properly perform job responsibilities;
- (e) failing to have due regard for the plaintiff;
- (d) failing to be attentive under the circumstances;
- (f) failing to follow proper protocol, procedures and rules applicable

for the operation of the shuttle van;

(g) and was otherwise acting in a careless and negligent manner by failing to exercise due care under the circumstances.

16. This accident resulted solely from the negligence of the defendants who are individually, severally and jointly liable, and was in no manner whatsoever due to any act or failure to act on the part of the plaintiff.

17. As a result of the aforesaid negligence of the defendants, Community Renovations, Inc., its agent, servant and/or employee, John Williams, plaintiff, Elizabeth Jones, sustained serious, permanent and disabling personal injuries, endured pain and suffering, incurred medical expenses, was unable to attend to her normal duties and affairs, lost wages, and was otherwise injured and damaged.

WHEREFORE, plaintiff, Elizabeth Jones, demands judgment in her favor and against defendants, Community Renovations, Inc. and/or John Williams, in an amount in excess of \$75,000.00, together with interest, costs of suit and such other relief as the court may deem appropriate.

JURY DEMAND

Plaintiffs hereby demand a trial by jury as to all issues.

DATED: September 7, 2006

/s/ Randy P. Catalano
RANDY P. CATALANO
Attorney for Plaintiff, Elizabeth Jones